



August 29, 2007

Mr. Mark Hutchins
Manager, Renewable Energy Office
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Re: Comments on CSI and Eligibility Criteria and Conditions for Incentives for Solar Energy Systems

Dear Mr. Pennington:

I am writing on behalf of Sopogy, Inc. of Honolulu, Hawaii. Sopogy is a manufacturer of Concentrating Solar Power (CSP) collectors and will be deploying in California. We applaud the California Energy Commission's work in developing the California Solar Initiative program.

The intent of this letter is to express general concerns that Sopogy has about the CSI and the Eligibility Criteria and Conditions for Incentives for Solar Energy Systems. We acknowledge that the CSI was drafted around the initial assumption that PV is the primary solar technology. We are pleased that the CSI has left a door open for the participation of solar thermal systems and will present some general recommendations that we respectfully ask to be considered in broadening the scope of the CSI to embrace CSP systems that use solar thermal energy for either or both power generation and solar air conditioning.

We have reviewed the June 1, 2007 Advice Letters 2140-E and 3060-E submitted by the SCE and PG&E and appreciate that they have made many useful modifications that will enable solar thermal applications to participate in the program. We also take no exception to the issues raised in the June 26, 2007 Letter of Protest submitted by PV Now and CALSEIA. While there is not 100% overlap, many of our concerns are the same.

Our request is general. We ask that the CEC continue to work in an open forum with the utilities, advisory committees, and stakeholders to adapt processes and procedures to ensure that characteristics of concentrated solar power and downstream applications such as power generation and air conditioning are addressed in the eligibility criteria. Of particular concern is the metering when thermal processes are the primary, or when thermal processes are in combination with solar thermal power generating systems.

Thank you very much for your consideration.

Respectfully submitted,

Jim Maskrey
Vice president

